

# PAUL HASTINGS

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## Via ECF

June 2, 2025

The Honorable John Milton Young  
United States District Judge  
Eastern District of Pennsylvania  
15613 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

**Re: *Rushdie-Ahmed v. Trustees of the University of Pennsylvania, et al.*, No. 2:22-cv-05030-JMY**

Dear Judge Young:

We represent Defendants Trustees of the University of Pennsylvania, Heather Sharkey, Christina Frei, Paul Cobb, and Jeffrey Kallberg (collectively, "Defendants"). In accordance with this Court's May 15, 2025 Amended Scheduling Order, ECF No. 47, ("Order"), Defendants are simultaneously filing the following with this letter: (i) proposed *voir dire* questions, (ii) proposed jury instructions, (iii) proposed jury interrogatories, (iv) their exhibit and witness lists, and (v) their trial memorandum pursuant to Local Rule 16.1.

We provided drafts of the proposed *voir dire* questions, proposed jury instructions, and proposed jury interrogatories to Plaintiff's counsel in an effort to determine if we could file those jointly per the Court's Order. We told Plaintiff's counsel that we welcomed Plaintiff's edits and any attempt to reach an agreement on joint filings, but that we would be filing the documents at 5 p.m. Eastern today, June 2, 2025, in accordance with the deadline in this Court's Scheduling Order. Plaintiff's counsel indicated that he would provide us proposed edits on May 31, 2025. However, Plaintiff has yet to provide any substantive responses to the drafts that were sent. Accordingly, we are filing the proposed *voir dire* questions, proposed jury instructions, and proposed jury interrogatories on behalf of Defendants only.

Respectfully submitted,



Jeff Sturgeon  
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